

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

FILED

NOV 17 2020

PATRICK KEANEY
Clerk, U.S. District Court

By Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENDALL LEN BURGESS and
POLLY ANNE SANDERS,

Defendants.

Case No.

CR 20-132-RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1153, 2241(c) & 2246(2)(B)]

On dates uncertain to the Grand Jury from in or about November 2018 to on or about April 19, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **KENDALL LEN BURGESS**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the penis and the mouth of P.G., a person who had not attained the age of 12 years, in violation of Title 18, United States Code, Sections 1151, 1153, 2241(c) and 2246(2)(B).

COUNT TWO

ABUSIVE SEXUAL CONTACT IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1153, 2244(a)(5) & 2246(3)]

On dates uncertain to the Grand Jury from in or about November 2018 to on or about April 19, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **KENDALL LEN BURGESS**, an Indian, did knowingly engage in and cause sexual contact as defined in Title

18, United States Code, Section 2246, to wit: the intentional touching, through the clothing, of the genitalia of P.G., a person who had not attained the age of 12 years, with an intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 1151, 1153, 2244(a)(5) and 2246(3).

COUNT THREE

**ASSAULT WITH A DANGEROUS WEAPON WITH INTENT TO DO BODILY HARM
IN INDIAN COUNTRY
[18 U.S.C. §§ 113(a)(3), 1151 & 1153]**

On or about August 18, 2020, within the Eastern District of Oklahoma, in Indian Country, the defendant, **POLLY ANNE SANDERS**, an Indian, did assault D.L., with a dangerous weapon, with intent to do bodily harm, in violation of Title 18, United States Code, Sections 113(a)(3), 1151 and 1153.

COUNT FOUR [MISDEMEANOR]

**ASSAULT BY STRIKING, BEATING, OR WOUNDING IN INDIAN COUNTRY
[18 U.S.C. §§ 113(a)(4), 1151 & 1152]**

On or about August 18, 2020, within the Eastern District of Oklahoma, in Indian Country, the defendant, **KENDALL LEN BURGESS**, an Indian, did assault A.B., by striking, beating, and wounding, in violation of Title 18, United States Code, Sections 113(a)(4), 1151 and 1152.

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

BRIAN J. KUESTER
United States Attorney

s / Foreperson
FOREPERSON OF THE GRAND JURY


LINWOOD C. WRIGHT, JR. PA BAR # 49401
Special Assistant United States Attorney